

EXHIBIT F

**PLAINTIFF JOE ANDREW SALAZAR'S UPDATED DEPOSITION
DESIGNATIONS AND HTC CORPORATION'S OBJECTIONS
AND COUNTER DEPOSITION DESIGNATIONS**

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court's Eighth Amended Docket Control Order (Dkt. 212), Plaintiff Joe Andrew Salazar ("Salazar") hereby submits the following designations from the depositions of those witnesses whose testimony Salazar expects to present at trial by deposition, or may present by deposition if the need arises.

These deposition designations do not identify those witnesses whose testimony Salazar may choose to counter-designate, and Salazar hereby reserves the right to counter-designate the testimony of any witness whose deposition testimony is designated by Defendant HTC Corporation ("HTC") and/or proffered by HTC at trial. Likewise, these deposition designations do not include deposition testimony that Salazar may use to cross-examine any witness called at trial, and Salazar hereby reserves the right to use deposition testimony to cross-examine and/or impeach any witness called live or by deposition at trial by any party, regardless of whether that witness's testimony is designated herein. Salazar further reserves the right to present witnesses by deposition and designate their deposition testimony in the event that they become unavailable for trial.

In addition, Salazar reserves the right to amend and/or supplement these Deposition Designations to add or delete deposition testimony as allowed by the Court and law, including to add rebuttal and/or counter-designations, and counter-counter designations, as contemplated by the Court's Eighth Amended Docket Control Order (Dkt. 212), in rebuttal to HTC's case, arguments or evidence, for purposes of authenticating evidence, and/or in response to any deposition testimony designated or counter-designated by HTC. Salazar notes that his designation of any deposition testimony herein is not an admission that such testimony would be admissible if

proffered by HTC and Salazar reserves the right to withdraw or choose not to offer the designated deposition testimony, in whole or in part.

At this time, Salazar identifies the following deposition designations in alphabetical order:

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PLAINTIFF JOE ANDREW SALAZAR'S UPDATED DEPOSITION DESIGNATIONS

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
Blok, Justin	January 24, 2018						
Ho, Chia Chu	December 1, 2017	17:9 – 19:15	18:1-9 – 401/402; 403				
			18:22-19:3 – objectionable as compound				
				7:22-24			
				8:3-22			
				8:24			
Gottesman, Oded	February 19, 2018						
Griffin, Roy	January 23, 2018						
Griffin, Roy	February 9, 2018						
Lai, Hsiu Fen	December 1, 2017	11:1 – 18:25	11:1-12:9 – 401/402; 403				
			13:15-15:13 – 401/402, 403				
			18:1-7 – 401/402, 403				
			18:18-25 – 401/402, 403				
				7:16-23		20:11-17	Compound, Beyond the Scope
				12:13-15		26:20-37:4	28:16-29:5 – 401/402, 403
				15:14-20			29:16-17 – 401/402, 403
				15:22			29:18-21 – Vague

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
				19:18-21			30:22-31:5 – 401/402, 403, Vague, Compound
				19:23-25			31:20 – 31:22 – Compound
				20:3-6			31:23-32:1 – 401/402, 403
				20:8-10			32:20-33:5 – Compound
							34:8-34:15 – Vague, 401/402, 403
							34:16-20 – Vague, 401/402, 403, Misstates prior testimony
							34:21-35:6 – Vague
						38:24-48:21	38:24-39:14 – Vague, 401/402, 403
							39:14-21 - Compound
							39:22-40:18 – 401/402, 403, Vague, Assumes Facts Not in Evidence

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
							41:16-42:5 – 401/402, 403, Subject to HTC MIL 2C
							42:19-43:1 – 401/402, 403
		20:24-22:4	20:24-21:1 – objectionable as vague & ambiguous, Subject to HTC MIL 1.A				
			21:8-18 – 401/402, 403, stricken question, Subject to HTC MIL 1.A				
		22:15-23:11	Subject to HTC MIL 1.A				
Lam, Vincent	March 22, 2018						
Muthukumarasamy, Sivasubramanian	January 8, 2018	25:7-29:21	25:7 – 401/402; 403; objectionable as only an answer without a question				
			25:19-23 – objectionable as vague and ambiguous				

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
			and withdrawn/ stricken				
			26:5-25 – 401/402; 403; objectionable as vague and ambiguous and as compound; no answer				
			27:21-28:3 – 401/402; objectionable as compound and vague and ambiguous; no answer				
				8:14-12:25	401/402, 602F, 602P, VA		
				13:20-18:8	401/402, 602F, 602P, VA, LC		
				20:5-7			
				20:11-13			
				20:20-23			
				27:2-3			
				27:5-20			
				28:5-11			
				28:13-16			

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
Meyers, Robert	December 21, 2017						
Salazar, Joe Andrew	December 20, 2017						
Wei, Tung Shan	December 1, 2017						
Wolfe, Andrew	January 31, 2018						
Ho, Chia Chu "Robbie" and Wu, Chih Chung "Brian"	March 30, 2018 (March 29, 2018 EST)	23:1-20	23:4-17 – 401/402; 403; HTC's MIL #II.C (discovery conduct/ disputes)				
		23:21-24:17	401/402; 403; objectionable as vague and ambiguous; HTC's MIL #II.C (discovery conduct/ disputes)				
		24:18-26:24	24:18-25:12 – 401/402; 403; objectionable as improper narrative by counsel 25:20-21 – 401/402				

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
			26:5-24 – 602; objectionable as vague and ambiguous; outside scope of 30(b)(6) 26:10-20 – 401/402; 403				
		28:18-25	objectionable as vague and ambiguous; HTC's MIL #II.C (discovery conduct/ disputes)				
		32:18-33:1	32:18-33:1 - objectionable as vague and ambiguous; HTC's MIL II.C (discovery conduct/ disputes) 32:18-19 – 401/402; 403				

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
		33:2-9	outside the scope				
		33:10-19	33:10-19 – objectionable as argumentative and mischaracterizes the witness' prior testimony; HTC's MIL II.C (discovery conduct/ disputes) 33:6, 14-16 – 401/402				
		34:18-35:6	34:18-21 – objectionable as vague and ambiguous 34:22-34:25 – 401/402, 403 35:3-6 – 401/402; objectionable as vague and ambiguous				

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
			and argumentative				
		46:22-25	401/402; outside the scope				
		47:5-15	47:5-9 – 401/402/ 403; objectionable as argumentative and improper narrative by counsel 47:13-15 – 401/402; 403				
		48:12-49:4,	48:12-14 – outside the scope; HTC's MIL II.C (discovery conduct/ disputes) 48:15-49:1 – 401/402; 403; HTC's MIL II.C (discovery conduct/ disputes)				

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
			49:2-4 – outside the scope; HTC's MIL II.C (discovery conduct/ disputes)				
		49:23-51:5	49:23-50:4 – 401/402; objectionable as vague and ambiguous; outside the scope; HTC's MIL II.C (discovery conduct/ disputes) 50:5-8 – objectionable as argumentative ; 401/402; 403; outside the scope; HTC's MIL II.C (discovery conduct/ disputes)				

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
			50:9-16 – 401/402; objectionable as vague and ambiguous; outside the scope; HTC's MIL ILC (discovery conduct/ disputes)				
			50:17-51:5 – 401/402; 403; 401/402; outside the scope; HTC's MIL (discovery conduct/ disputes)				
				44:17-19			
				44:25-45:9			
				45:11-12			
				56:5-8	Improper Leading Question (LQ)		
				56:10-14	LQ		
				56:16-20	LQ		
				56:22-57:1	LQ		
				57:10-21	LQ		
				57:23-58:2	LQ		

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
				58:4-10	LQ		
				58:12-15	LQ		
				59:13-59:17	LQ		
				59:19-22	LQ		
				59:24-60:3	LQ		
				60:9-14	LQ		
				60:17-24	LQ		
				61:1-8	LQ		
				61:10-15	LQ		
				61:17	LQ		
				61:19 - 25	LQ		
				62:5-8	LQ		
				62:15-20	LQ		
				63:3-7	LQ		
				63:9	LQ		